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VIA ECF

Honorable William J. Martini
United States District Judge
Martin Luther King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, NJ 07102

Re: In re Urethane Antitrust Litigation
Docket No. 08-5169 (WJM) (MF)

Dear Judge Martini:

On behalf of Defendant Dow, thank you for yesterday providing us with the questions that Your Honor has determined to ask as part of *voir dire* in the above-captioned matter, presumably in addition to the standard biographical questions that the Court usually uses (most of which are also encompassed in the jury questionnaire that Dow previously provided for the convenience of the Court and prospective jurors, *see* ECF No. 252 at 12-13). We write to respectfully request that the Court consider this letter, in which we propose that Your Honor ask three brief additional questions, which we believe will assist the parties in jury selection. Rather than raising this matter orally on Monday morning, we thought it best to set forth this request in writing today, for the convenience of the Court and counsel.

The three short questions we ask the Court to pose are as follows:

1. Do you have any training or work experience in accounting, finance, contracts or law? If yes, please explain.
2. Have you ever been a member of a union? If yes, did you hold any leadership role or position in the union? If yes, explain.
3. Have you or a family member served in the military? If yes, who served, in which branch of the military, and during what years?

Thank you for your kind consideration of this request.

Respectfully yours,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (*via* ECF)